

1 Steven W. Fogg, WSBA No. 23528
2 CORR CRONIN LLP
3 1015 Second Avenue, Floor 10
Seattle, WA 98104-1001
4 Ph: (206) 625-8600
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NATIONAL SHOOTING SPORTS
FOUNDATION, INC.,

Plaintiff,

v.

ROBERT W. FERGUSON,
ATTORNEY GENERAL OF THE
STATE OF WASHINGTON,

Defendant.

No. 2:23-cv-00113-MKD

MOTION FOR LEAVE TO
APPEAR PRO HAC VICE FOR
PAUL D. CLEMENT

05/30/2023
Without Oral Argument

I, Steven Fogg, counsel of record for Plaintiff National Shooting Sports Foundation, Inc., respectfully move the Court for an Order granting admission pro hac vice to attorney Paul D. Clement to appear in the above-captioned matter as counsel for Plaintiff pursuant to Local Rule 83.2(c). I am a licensed member in good standing of the State of Washington bar (WSBA No. 23528) and this Court.

Paul D. Clement's qualifications for pro hac admission and other information required by Local Rule 83.2(c)(3) are set forth below:

MOTION FOR LEAVE TO
APPEAR PRO HAC VICE- 1

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1 A. Applicant's address and phone number:

2 Paul D. Clement
 3 Clement & Murphy, PLLC
 4 706 Duke Street
 5 Alexandria, VA 22314
 6 (202) 742-8900

7 B. Dates of admission to practice before other courts:

Court	Admission Date
Virginia State Bar	10/06/1994
District of Columbia Bar	05/03/1996
Wisconsin State Bar	05/29/2003
Supreme Court of the United States Bar	01/24/2000
U.S. Court of Appeals for the First Circuit	08/06/2010
U.S. Court of Appeals for the Second Circuit	11/10/2003
U.S. Court of Appeals for the Third Circuit	08/02/2011
U.S. Court of Appeals for the Fourth Circuit	03/30/2000
U.S. Court of Appeals for the Fifth Circuit	09/28/2009
U.S. Court of Appeals for the Sixth Circuit	03/02/2000
U.S. Court of Appeals for the Seventh Circuit	01/09/20001
U.S. Court of Appeals for the Eighth Circuit	09/03/1996
U.S. Court of Appeals for the Ninth Circuit	06/14/2002
U.S. Court of Appeals for the Tenth Circuit	03/22/2000
U.S. Court of Appeals for the Eleventh Circuit	01/27/2009
U.S. Court of Appeals for the District of Columbia Circuit	07/31/1996
U.S. Court of Appeals for the Federal Circuit	04/19/2000
U.S. Court of Federal Claims	11/03/2016
U.S. District Court for the District of Columbia	09/29/2009
U.S. District Court for the Northern District of Florida	05/01/2015

MOTION FOR LEAVE TO
 APPEAR PRO HAC VICE- 2

CORR CRONIN LLP
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 Seattle, Washington 98104-1001
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 Fax (206) 625-0900

1 C. Name, address, and phone number of admitted counsel with whom the
2 applicant is associated.

3 Steven Fogg
4 Corr Cronin LLP
5 1015 Second Avenue, Floor 10
6 Seattle, WA 98104-1001
7 (206) 625-8600

8 D. The necessity for appearance by the applicant.

9 Given his experience and the focus of his practice, Paul D. Clement's
10 participation in this action would benefit Plaintiff and would assist in ensuring a fair
11 and efficient resolution of this matter.

12 E. Whether the applicant has any pending disciplinary sanction actions or
13 has ever been subject to disciplinary sanctions by any court or bar association.

14 Mr. Clement does not have any pending disciplinary sanctions against him,
15 nor has he ever been subject to any disciplinary sanctions by any court or bar
16 admission.

17 WHEREFORE, we respectfully request that the Court admit Paul D. Clement
18 to appear pro hac vice in this action as counsel for Plaintiff National Shooting Sports
19 Foundation, Inc.

20 DATED this 27th day of April, 2023.

21 CORR CRONIN LLP

22 *s/ Steven W. Fogg*

23 Steven W. Fogg, WSBA No. 23528
24 CORR CRONIN LLP
25 1015 Second Avenue, Floor 10
 Seattle, Washington 98104-1001
 Ph: (206) 625-8600 | Fax: (206) 625-0900
 sfogg@corrcronin.com

MOTION FOR LEAVE TO
APPEAR PRO HAC VICE- 3

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1
2 Paul D. Clement (*pro hac vice forthcoming*)
3 Erin E. Murphy (*pro hac vice forthcoming*)
4 Matthew D. Rowen (*pro hac vice forthcoming*)
5 CLEMENT & MURPHY, PLLC
6 706 Duke Street
7 Alexandria, VA 22314
8 Ph: (202) 742-8900
9 paul.clement@clementmurphy.com
10 erin.murphy@clementmurphy.com
11 matthew.rowen@clementmurphy.com

12 *Attorneys for Plaintiff*
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MOTION FOR LEAVE TO
APPEAR PRO HAC VICE- 4

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2023, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice. I hereby certify that I have also served the foregoing with the complaint on all defendants when accomplishing service of process.

DATED this 27th day April, 2023.

s/ Steven W. Fogg
Steven W. Fogg, WSBA No. 23528
CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Ph: (206) 625-8600 | Fax: (206) 625-0900
sfogg@corrchronin.com

**MOTION FOR LEAVE TO
APPEAR PRO HAC VICE- 5**

CORR CRONIN LLP
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Seattle, Washington 98104-1001
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Fax (206) 625-0900